

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

GWG HOLDINGS, INC., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-90032 (MI) (Jointly  
Administered)

MICHAEL I. GOLDBERG, as Trustee of the  
GWG LITIGATION TRUST,

Plaintiff,

v.

Adv. Pro. No. 24-03090 (MI)

BRADLEY K. HEPPNER, individually and in his capacity as Trustee of THE BRADLEY K. HEPPNER FAMILY TRUST, THE HEPPNER FAMILY HOME TRUST, THE HIGHLAND BUSINESS HOLDINGS TRUST, and THE HIGHLAND INVESTMENT HOLDINGS TRUST; BENEFICIENT CAPITAL COMPANY, L.L.C.; BENEFICIENT CAPITAL COMPANY II, L.L.C.; BENEFICIENT COMPANY HOLDINGS, L.P.; BENEFICIENT HOLDINGS, INC.; BENEFICIENT MANAGEMENT, L.L.C.; BRADLEY CAPITAL COMPANY, L.L.C.; PETER T. CANGANY, JR.; DAVID F. CHAVENSON; CT RISK MANAGEMENT, L.L.C.; ELMWOOD BRADLEY OAKS, L.P.; TIMOTHY L. EVANS; FUNDING TRUST MANAGEMENT, L.L.C.; TIMOTHY B. HARMON, in his capacity as Trustee of THE HIGHLAND INVESTMENT HOLDINGS TRUST; HCLP CREDIT COMPANY, L.L.C.; HCLP NOMINEES, L.L.C.; THOMAS O. HICKS; HIGHLAND CONSOLIDATED, L.P.; MURRAY T.

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538); GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

HOLLAND; LIQUIDTRUST MANAGEMENT, L.L.C.; RESEARCH RANCH OPERATING COMPANY, L.L.C.; BRUCE W. SCHNITZER; THE BENEFICIENT COMPANY GROUP, L.P.; THE BENEFICIENT COMPANY GROUP (USA), L.L.C.; and JOHN STAHL, in his capacity as Trustee of THE LT-1 COLLECTIVE COLLATERAL TRUST, THE LT-2 COLLECTIVE COLLATERAL TRUST, THE LT-3 COLLECTIVE COLLATERAL TRUST, THE LT-4 COLLECTIVE COLLATERAL TRUST, THE LT-5 COLLECTIVE COLLATERAL TRUST, THE LT-6 COLLECTIVE COLLATERAL TRUST, THE LT-7 COLLECTIVE COLLATERAL TRUST, THE LT-8 COLLECTIVE COLLATERAL TRUST, THE LT-9 COLLECTIVE COLLATERAL TRUST, THE LT-1 LIQUID TRUST, THE LT-2 LIQUID TRUST, THE LT-5 LIQUID TRUST, THE LT-7 LIQUID TRUST, THE LT-8 LIQUID TRUST, and THE LT-9 LIQUID TRUST,

Defendants.

### NOTICE OF JURY-TRIAL DEMAND

1. As stated on the record at the hearing on November 4, 2024 before the Court to consider the Motion To Withdraw The Reference,<sup>2</sup> Bradley K. Heppner and the Heppner-Related Entities<sup>3</sup> who filed the Motion To Withdraw The Reference (the “**Heppner Movants**”)<sup>4</sup> hereby demand a trial by jury with respect to any and all claims and causes of action asserted against them in the Complaint [ECF No. 3].

<sup>2</sup> Motion Of Bradley K. Heppner And Certain Heppner-Related Entities Pursuant To 28 U.S.C. § 157(d) And Fed. R. Bankr. P. 5011 And L.R. Bankr. P. 5011-1 To Withdraw Reference [ECF No. 58].

<sup>3</sup> See Compl. ¶ 42 (“Defendant Bradley K. Heppner [as] BEN’s founder, chairman, and CEO”); ¶ 43 (Defendant Beneficient Holdings, Inc. (“**BHI**”)); ¶ 44 (“Defendant Heppner, in his capacity as trustee of The Highland Business Holdings Trust”); ¶ 45 (“Defendant[] Heppner ... in [his] capacity as trustee[] of The Highland Investment Holdings Trust”); ¶ 46 (“Defendant Bradley Capital Company, L.L.C.”); ¶ 50 (“Defendant Heppner, in his capacity as trustee of The Bradley K. Heppner Family Trust”); ¶ 51 (“Defendant Heppner, in his capacity as trustee of The Heppner Family Home Trust”); ¶ 52 (Elmwood Bradley Oaks, L.P.); and ¶ 53 (Research Ranch Operating Company, L.L.C.).

<sup>4</sup> BHI is not a Heppner Movant.

2. As set forth in Mr. Heppner's and the Heppner-Related Entities' Motion To Dismiss [ECF No. 61],<sup>5</sup> pursuant to Bankruptcy Rule 7008 and Bankr. S.D. Tex. Local Rule 7008-1, Mr. Heppner and the Heppner-Related Entities respectfully do not consent to (a) the entry of final orders or a judgment by the Bankruptcy Court; or (b) a trial-by-jury before the Bankruptcy Court pursuant to 28 U.S.C. § 157(e).

Dated: November 5, 2024

Respectfully submitted,

By: /s/ James C. Tecce

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*Counsel to Heppner Movants*

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<sup>5</sup> Motion Of Bradley K. Heppner In His Individual Capacity And As Trustee Of The Highland Business Holdings Trust, The Highland Investment Holdings Trust, The Bradley K. Heppner Family Trust, And The Heppner Family Home Trust; Beneficient Holdings Inc.; Bradley Capital Company, L.L.C.; Elmwood Bradley Oaks L.P.; And Research Ranch Operating Company, L.L.C., Pursuant To Fed. R. Civ. P. 12(b)(3) and 12(b)(6) And Fed. R. Bankr. P. 7012 To Dismiss The Complaint [ECF No. 61].

**CERTIFICATE OF SERVICE**

I, James C. Tecce, certify that on November 5, 2024, I caused a true and correct copy of the Notice of Jury-Trial Demand to be served by the Court's CM/ECF system on all parties entitled to notice.

/s/ James C. Tecce

James C. Tecce